

Lawrence J. Semenza, III, Esq., Bar No. 7174
Email: ljs@skrlawyers.com
Christopher D. Kircher, Esq., Bar No. 11176
Email: cdk@skrlawyers.com
Jarrod L. Rickard, Esq., Bar No. 10203
Email: jlr@skrlawyers.com
SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803
Facsimile: (702) 920-8669

*Attorneys for Plaintiff Megan E. Klatt
and all others similarly situated*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MEGAN E. KLATT, an individual, on behalf of
herself and all others similarly situated;

Plaintiff,

v.

DIGNITY HEALTH, a California corporation;
DOES 1-50, unknown individuals; and ROE
COMPANIES 1-50, unknown business entities,

Defendants.

Case No. 2:17-cv-02425-RFB-BNW

**STIPULATION AND ORDER TO
CONTINUE SETTLEMENT
DOCUMENTS DEADLINE**

(Fourth Request)

Plaintiff Megan Klatt (“Plaintiff”), by and through her attorneys of record, and Defendant Dignity Health (“Defendant”) (collectively, the “Parties”), by and through its attorneys of record, submit this Stipulation and Order to Continue Settlement Documents Deadline (Fourth Request) (the “Stipulation”).

On February 28, 2019, the Parties participated in a mediation and subsequently reached a settlement in principal. Therefore, on April 5, 2019, the Parties submitted a Stipulation and Order to Suspend Dispositive Motion Deadlines Pending Settlement (“Stipulation to Suspend”), requesting that the dispositive motion deadlines be suspended while the Parties worked diligently to draft and agree upon the requisite settlement documents, ECF No. 86.

SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803

1 On April 10, 2019, the Court issued an Order granting the Stipulation to Suspend and
2 directed the Parties to file a stipulation to dismiss or dispositive motions by May 17, 2019, ECF
3 No. 87.

4 On May 16, 2019, the Parties filed a Stipulation and Order to Continue Settlement
5 Documents Deadline (First Request), ECF No. 89, which the Court granted on May 17, 2019, ECF
6 No. 93, because they needed additional time to complete the drafting of the settlement documents
7 given the complexity of the issues and length of documents, including a Joint Motion for
8 Preliminary Approval of Class Action Settlement and the associated Joint Stipulation of Settlement,
9 as well as various documents to be provided to the putative class members, which will require Court
10 approval.

11 On July 1, 2019, the Parties filed a Stipulation and Order to Continue Settlement Documents
12 Deadline (Second Request), ECF No. 95, which the Court granted on July 3, 2019, ECF No. 96,
13 because they needed additional time to complete the drafting of the settlement documents. The
14 settlement papers are currently due on July 10, 2019, ECF No. 96.

15 On July 10, 2019, the Parties filed a Stipulation and Order to Continue Settlement
16 Documents Deadline (Third Request), ECF No. 97, which the Court granted on July 11, 2019, ECF
17 No. 98, because they needed additional time to complete the drafting of the settlement documents.
18 The settlement papers are currently due on July 19, 2019, ECF No. 98.

19 Since the last extension was granted, the Parties have continued to work diligently to finalize
20 the settlement papers and have discussed additional changes to the settlement papers, but have been
21 unable to finalize the documents in light of counsel for Plaintiff being out of the office traveling on
22 vacation. As such, the Parties request an additional seven (7) days, through and including July 26,
23 2019, to complete the documents and submit the papers for Court approval.

24 ///

25 ///

26 ///

27 ///

28 ///

1 This Stipulation is submitted in good faith and not for the purpose of delay.

2 Dated this 19th day of July 2019.

3 SEMENZA KIRCHER RICKARD

4 /s/ Lawrence J. Semenza, III, Esq.

5 Lawrence J. Semenza, III, Esq., Bar No. 7174

6 Christopher D. Kircher, Esq., Bar No. 11176

7 Jarrod L. Rickard, Esq., Bar No. 10203

8 10161 Park Run Drive, Suite 150

9 Las Vegas, Nevada 89145

10 *Attorneys for Plaintiff Megan E.*

11 *Klatt and all others similarly situated*

12 Dated this 19th day of July 2019.

13 JACKSON LEWIS P.C.

14 /s/ Kristen A. Milton Esq.

15 Elayna J. Youchah, Esq., Bar No. 5837

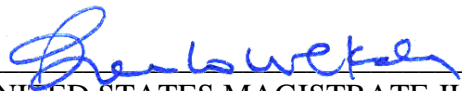
16 Kirsten A. Milton, Esq., Bar No. 14401

17 3800 Howard Hughes Parkway, Suite

18 600 Las Vegas, Nevada 89169

19 *Attorneys for Defendant Dignity Health*

20 **IT IS SO ORDERED.**

21 
22 UNITED STATES MAGISTRATE JUDGE
23 DATED this 22nd day of July 2019.
24
25
26
27
28